

NATIONAL PARKS CONSERVATION ASSOCIATION

Protecting Parks for Future Generations

March 28, 2008

Submitted via email to Carl Zichella and Johanna Wald

**Re: Comments on the Renewable Energy Transmission Initiative Phase IA Draft Report
(Black & Veatch Project Number 149148.0010)**

To Whom It May Concern:

On behalf of our more than 340,000 members, the National Parks Conservation Association (NPCA) would like to thank you for the opportunity to comment on the Renewable Energy Transmission Initiative (RETI) Phase IA Draft Report. Our members care deeply for America's shared natural and cultural heritage that is preserved by units of the National Park System and other Park Service affiliated areas, and NPCA recognizes that developing renewable energy is necessary to reduce impacts to our National Parks from climate change and air pollution.

While we are pleased that the RETI Draft Report specifically names National Parks as "environmentally sensitive areas" and declares "their associated resources are considered undevelopable" (3.5.1), we have concerns about the report's failure to integrate environmental criteria in its analytic processes. Environmental factors must have equal weight with economic factors when creating a plan for a renewable energy future.

The analysis of Biomass co-firing (5.1.2) as a renewable energy source provides a transparent example of the flaws in Black & Veatch's work plan. The RETI Draft Report states, "One of the most economical methods to burn biomass is to cofire it with coal in existing plants." In the draft RETI report, Biomass co-firing receives the lowest levelized cost rating of all the energy sources, and is presented in multiple charts as the least expensive and most attractive option. The environmental cost of developing more coal-fired power plants necessary to implement widespread biomass co-firing is ignored. Instead, the report gives Biomass co-firing this glowing environmental review: "...cofiring biomass in a coal plant generally has overall positive environmental effects. The clean biomass fuel typically reduces emissions of SO₂, CO₂, NO_x, and heavy metals such as mercury." Biomass co-firing is being compared here to coal-only plants, not to the other renewable energy sources in the report. Without environmental concerns being fully integrated into the analysis, there exists a very real danger of embarking on an energy future that is not sustainable, renewable, or in the best interest of our National Parks.

Specifically, NPCA is concerned that the RETI Phase IA Draft Report does not include:

- a quantitative analysis of relative greenhouse gas emissions resulting from each of the renewable sources;
- a quantitative analysis of the release of other air pollutants resulting from each of the renewable sources;



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- examination of each energy source, its associated transmission needs, and the ranking of “renewable energy zones” based on compliance with the Endangered Species Act and National Historic Preservation Act;
- examination of each energy source, its associated transmission needs, and the ranking of “renewable energy zones” based on potential impacts to National Park viewsheds and wildlife corridors; and
- most importantly, the meaningful incorporation of all of these environmental concerns as rigorous criteria for analysis, given equal weight with the economic and other criteria in the report.

The National Park Service is unique in that it has a single-use mandate unlike other public land management agencies. In fact, America’s great admiration for its national parks is due in part to the agency’s clear mandate to “conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations.”¹

We recognize the tremendous benefit that renewable energy holds for the National Park Service as it seeks to fulfill its mandate, and we hope that our comments on the RETI Phase IA Draft Report are fully integrated into this planning process.

Sincerely,

Mike Cipra
National Parks Conservation Association

¹ 16 U.S.C 1



